

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOSE JIMINEZ MORENO and MARIA JOSE)	
LOPEZ, on behalf of themselves and all others)	
similarly situated,)	No. 11-CV-05452
)	
Plaintiffs,)	Judge John Z. Lee
v.)	
)	Defendants' Motion to Stay the Effect
JANET NAPOLITANO, <i>et al.</i> , in their official)	of Judgment Pending Appeal
capacities,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR ADDITIONAL TIME TO FILE A MOTION TO STAY
THE EFFECT OF JUDGMENT PENDING APPEAL**

Defendants, in their official capacities, by and through their attorneys, move this Court for a continuance until October 21, 2016, to file its motion to stay enforcement of the judgment pending appeal. On September 30, 2016, this Court denied Defendants' motion to decertify the class and granted Plaintiffs' motion for summary judgment, holding that that Defendants' detainer practices are unlawful. (ECF No. 230) The Court instructed Defendants to file their motion for a stay of the effect of judgment pending appeal by October 6, 2016, should they choose to do so. Defendants request an additional 15 days to file their motion to stay the effect of judgment pending appeal, and request a concomitant period of time for the Court to maintain in place the one-week stay it ordered when it entered its ruling. Counsel for Plaintiffs indicate that they will take a position on this motion on October 7, at the status conference. This motion is supported by the attached memorandum of law.

Date: October 4, 2016

Respectfully submitted,

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